

August 8, 2025

VIA ECF

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United Courthouse
40 Foley Square New York, New York 10007

Re: *United States v. Alexander*, No. 24-cr-00676 (VEC)

Dear Judge Caproni:

On behalf of Oren Alexander and Alon Alexander, we write to respectfully request a 10-day extension of time to file replies in support of pretrial motions. We have been informed that Oren Alexander is in the process of finalizing engagement of New York counsel to represent him at trial; incoming counsel has requested an opportunity to review and to contribute to the replies before they are filed.

This Court previously granted a one-week extension of time for defendants to file their replies in support of pretrial motions. ECF No. 133. The replies are currently due Friday, August 8, 2025.

On August 7, 2025, Tal Alexander filed his replies in support of his motions. ECF No. 136; ECF No. 138. Also on August 7, 2025, this Court adjourned the pretrial motions hearing that was previously scheduled for August 19, 2025, indicating that “the Court will reschedule the hearing for a later date if necessary.” ECF No. 135:2.

Oren and Alon plan to file a joint omnibus reply in support of their pretrial motions. Incoming New York counsel for Oren—who we anticipate will file an appearance in the next several days—would like the opportunity to meaningfully review and to weigh in on the replies prior to filing. We therefore request a 10-day extension of time to August 18, 2025.

Undersigned counsel is also recovering from a surgical procedure on his left eye that occurred on Wednesday August 6, 2025, which has limited his eyesight and reading abilities. This further justifies granting the requested extension.

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We have conferred with counsel for the government, who represented that they do not oppose the requested relief.

Thank you for your consideration.

Respectfully submitted,

KLUGH WILSON LLC

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